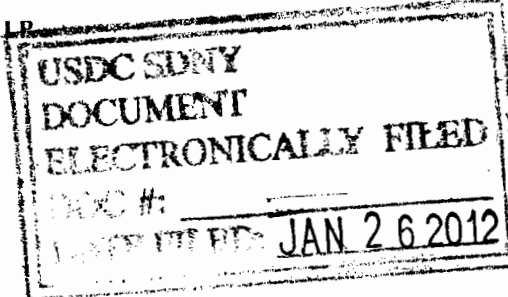


BAKER BOTTS

January 25, 2012

BY FACSIMILE

The Honorable Laura Taylor Swain
 United States District Court for the
 Southern District of New York
 Daniel Patrick Moynihan U.S. Courthouse
 500 Pearl Street, Courtroom 11C
 New York, New York 10007



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MEMO ENDORSED

Re: Williamson v. Verizon Communications Inc. et al., Case No. 1:11-cv-04948 (LTS)

Dear Judge Swain:

We represent Defendants AT&T, Inc., AT&T Operations, Inc., and AT&T Services, Inc. ("AT&T") in the above-referenced action, and write to request permission to file a confidential document under seal. No protective order has yet been entered in this case, though the parties are actively preparing and conferring on a form of stipulated protective order to be submitted for the Court's consideration.

Per the Court's instructions during the initial pre-trial conference held on November 3, 2011, AT&T seeks to file a motion to reinstate two motions that were terminated without prejudice pending AT&T's provision of jurisdictional discovery to Plaintiff (Dkt. Nos. 44 and 47). One of the exhibits AT&T seeks to submit in support of its motion to reinstate is AT&T's Responses to Plaintiff's First Set of Jurisdictional Interrogatories ("Interrogatory Responses"), which includes AT&T confidential information. We respectfully request that the Court enter an Order permitting AT&T to file this supporting exhibit under seal.

AT&T has good cause for this request because the interrogatory responses contain highly confidential business information of AT&T, the disclosure of which to the public could result in injury to AT&T. AT&T has conferred with counsel for Plaintiff in good faith and Plaintiff does not oppose this request for under seal filing. Counsel have further conferred regarding the underlying motion to reinstate, and Plaintiff has indicated it will oppose that underlying motion.

Respectfully submitted,

The request is granted.

Robert L. Maier

SO ORDERED.

NEW YORK, NY

LAURA TAYLOR SWAIN

Jan 26 2012

UNITED STATES DISTRICT JUDGE

RLM:jpm

cc: All Counsel of Record (via email)